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ENVIRONMENTAL PROTECTION AGENCY  
Technical Enforcement Support at Hazardous Waste Sites

<b>APPROPRIATION:</b> <input type="checkbox"/> CERCLA <input checked="" type="checkbox"/> RCRA <input type="checkbox"/> Other Funding Acct. No. _____		<b>TES NO.</b> <u>IV</u> Contract No. <u>68-01-7351</u> Prime Contractor Name <u>Jacobs</u>		<b>WORK ASSIGNMENT NO.</b> _____ <input checked="" type="checkbox"/> Original <input type="checkbox"/> Amendment No. _____ Priority: <input checked="" type="checkbox"/> Normal <input type="checkbox"/> Expedite* <input type="checkbox"/> Emergency*	
<b>SITE/FACILITY:</b> <u>Sheller-Globe</u> or Project Name		<u>Keokuk</u> Site/Facility Location (City or County)		<u>IA</u> <u>VII</u> State Region/HQ	
NPL Site: <input type="checkbox"/> Final or Proposed List <input checked="" type="checkbox"/> No RCRA Facility: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Facility ID# <u>IAD005136023</u>		Site Acct. #: _____		SCAP Activity Link: _____	
<b>PURPOSE:</b> <input checked="" type="checkbox"/> Initiate New Work Assignment <input type="checkbox"/> Work Plan Approval** <input type="checkbox"/> Disapprove Work Plan (Contractor will immediately stop work) <input type="checkbox"/> Work Plan Revision: ( <input type="checkbox"/> SOW <input type="checkbox"/> Cost/Hours) <input type="checkbox"/> Closeout Work Assignment (All final deliverables received)					
<b>STATEMENT OF WORK SUMMARY (SOW)</b> (Attach a <u>Detailed</u> SOW) (See Reporting Requirements): Task Type <u>RCRA Facility Assessment</u> Task No.: <u>80</u> (Must identify task type and number according to TES User's Guide to show activity is within the overall TES contract SOW) Summary/Comments: (see attached statement of work)					
<b>BASE PERIOD</b> <u>PE</u> Previously Approved <u>LOE 256</u> <u>Cost/Fee 14080</u> This Action <u>PE 256</u> <u>14080</u> Total		<b>OPTION PERIOD</b> (Authorized only if contract option is exercised) Previously Approved <u>LOE 256</u> <u>Cost/Fee 14080</u> This Action <u>256</u> <u>14080</u> Total		TES II: Use Option Column TES III & IV: Base period ends 9/30/87. Any work required after that date should appear in option column.	
<b>PERIOD OF PERFORMANCE</b> From: Effective date below To: <u>September 30, 1988</u> (closeout date not to exceed September 30, 1987)		<b>PERIOD OF PERFORMANCE</b> From: _____ To: <u>Sept 30, 1988</u> (Closeout date)			
(Do not include clerical or Expert Witness hours in the LOE estimate. Expert Witness costs are considered "Other Direct Costs." Estimate the Expert Witness hours in the attached Scope of Work.)					
No. of Pages to Follow <u>6</u> (Including SOW)		Reference Info.: <input checked="" type="checkbox"/> Attached <input type="checkbox"/> Transmitted Separately <input type="checkbox"/> Pickup From _____			
<b>REPORTING REQUIREMENTS:</b> <input checked="" type="checkbox"/> Briefing(s) <input checked="" type="checkbox"/> Letter Report <input checked="" type="checkbox"/> Draft Report <input checked="" type="checkbox"/> Final Report*** <input type="checkbox"/> Other Deliverables are to be marked ENFORCEMENT CONFIDENTIAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Reporting requirements and deliverables may differ for each TES contract. Include in the SOW a schedule for deliverables. If the number of reports required for your deliverables differs from the contract's normal requirement, request that in your SOW.					
<b>INITIATOR:</b> <u>David Huyett, US EPA Region VII</u> Primary Contact <u>726 Minn. Ave., KC, KS 66101</u> Address		<u>2/2/88</u> Date Phone no. <u>757-2887</u> <u>913/236-2887</u> <u>FTS</u> <u>Off-NET</u>			
<b>CONCURRENCE:</b> <u>Paula Eager</u> Regional Contact		<u>Feb 17, 1988</u> Date			
<b>APPROVAL:</b> _____ Project Officer (HQ TES P.O.)		_____ Date			
_____ Contracting Officer					
<b>CONTRACTOR ACKNOWLEDGEMENT OF RECEIPT:</b>		 R00110927 RCRA RECORDS CENTER			
_____ Signature and Title		_____ Date			
*Justification required in comment section. **Required within 45 days of effective date or work stops. ***30 day minimum required between draft and final report.					

Attachment A

STATEMENT OF WORK

RCRA FACILITY ASSESSMENT

FACILITY NAME: Sheller-Globe  
STREET: 3200 Main  
CITY: Keokuk  
STATE: Iowa  
EPA ID NO.: IAD005736023

BACKGROUND: Sheller-Globe manufactures rubber weather stripping, padded instrument panels and door panels for automotive applications.

On July 17, 1980, the facility filed with EPA a Notification of Hazardous Waste Activity indicating that it generated, and treated, stored or disposed of hazardous waste (F002, F003, F005, F017, D001, U002, U159, U161, U220, U223, U224 and U236. On June 12, 1983, Sheller-Globe amended its notification to include transportation of hazardous waste and added hazardous wastes U121, U140, U116, U219, and deleted hazardous waste U229 and U230. On August 20, 1986, the facility amended its notification to add D002. On November 17, 1980, Sheller-Globe filed Part A of the hazardous waste permit application and achieved interim status for a container storage unit.

During subsequent enforcement actions in 1987 and 1988, the facility has provided information that it discharged hazardous wastes D006 and D008 into an onsite ditch and 3.6 acre surface impoundment.

OBJECTIVES: To conduct a RCRA Facility Assessment (RFA) at the Sheller-Globe facility using the final RCRA Facility Assessment Guidance. The RCRA Facility Corrective Action program is a three-stage process for identifying releases or potential releases requiring further investigation. The steps in the process are 1) RCRA Facility Assessment (RFA); 2) RCRA Facility Investigation (RFI); 3) Corrective Measures.

The RFA is the first step in the corrective action program and is the purpose of this work assignment. The purpose of the RFA is to obtain facility specific information as follows:

1. Identify and gather information on releases or potential releases from the facility.
2. Evaluate regulated units and solid waste management units (SWMUs) and other areas of concern for releases to all media.

3. Make preliminary determinations regarding releases of concern and the need for further actions and interim measures at the facility.

4. Screen from further investigation those SWMUs or regulated units which do not pose a threat to human health or the environment.

In conducting the RFA, provide strong supportable decisions for the need of additional sampling to fill data gaps at the facility. If data gaps exist, proceed with the development of a site specific sampling plan, Quality Assurance Project Plan and conduct the sampling at the facility. If the supportable data at the facility exists and leaves no data gaps, proceed to develop the final RFA report.

To conduct a preliminary review, start by the collection of information and all analytical data in Region VII's compliance, permit and Iowa State Program files and the information and data that may be contained in the Iowa Geologic Survey files in Iowa City. Iowa to determine to the extent possible: 1) Whether or not there are units (old, new or existing) at the facility that are or may be releasing hazardous constituents and the extent of that release; 2) The need for immediate corrective measures and the status of any corrective measures at this facility; 3) The need for a health assessment both on-site and off-site; 4) The focus of additional site investigation if needed; 5) The identification of wells within one half mile of the facility and any information on these wells including depth, date of construction, type of construction and any analytical data.

The files in Region VII and at Iowa Geologic Survey are extensive and an in-depth data collection and organization effort will be required to organize and present both on-site and off-site information concerning this facility. The visual site inspection (VSI) should be done during the initial visit to the Region, if possible. If a sampling visit (SV) is determined to be appropriate to fill data gaps, modify the Region's QAPP Plan to fit this facility and develop a site specific sampling plan. Upon approval of the QAPP Plan and the site specific sampling plan, conduct the sampling visit and carry out the sampling plan. Close coordination in scheduling the visual site inspection and sampling visit are required. The regional RCRA permit writer or enforcement officer will work closely with the contractor in developing letters of introduction for the contractor and transmitting letters or notice to the facility. All analytical data from sampling efforts will be provided to the regional project officer who will provide copies to the facility and to the contractor.

The purpose of the visual site inspection is to 1) identify all solid waste management units or facilities that pose no problem; 2) To identify units or facilities which may present a problem; 3) To gather evidence of releases sufficient to compel the owner/operator to conduct additional remedial investigation;

4) Prioritize solid waste units for further investigation; 5) Identify the scope of subsequent remedial investigations or if needed, immediate corrective actions.

Upon completion of the visual site inspection sampling visit (if needed), the contractor will develop a draft and then a final RFA report incorporating the PR, VSI and SV efforts. This report will contain all items set forth in the guidance including, but not limited to, completed check lists, a detailed map of the facility with all well locations, description of each well if known, photographic log, photographs, chain-of-custody forms, sampling forms, etc.

### TASKS

Task I. Coordinate with EPA Region VII staff in work plan development, modification of the work plan (if needed) and RFA planning.

Task II. Conduct a preliminary review (PR) as set forth in the RCRA Facility Assessment (RFA) Guidance, Chapter Two, and conduct a visual site investigation (VSI) of the facility as set forth in Chapter Three and Chapters Five through Nine of the RFA Guidance. The site visit should be planned through the regional project officer for Sheller-Globe and should be planned for the week of the preliminary review at the Region VII office, if possible.

Task III. Prepare a draft preliminary report incorporating the preliminary report and VSI information. Make clear and supportable recommendations as to the need for additional sampling at the facility to fill data gaps. If sufficient data is available at the facility, forego Tasks 5 through 7 and develop a final draft RFA report for submittal to the Region upon verbal concurrence from the Regional project officer. The final RFA report should support, with adequate justification, the need not to sample at the facility.

Task IV. Prepare the final PR as set forth in Chapter Three of the RFA Guidance.

Task V. Prepare the draft site specific sampling plan as in Chapter Four of the RFA Guidance and modify the regional QAPP plan for this work assignment.

Task VI. Finalize the QAPP plan and site specific sampling plan incorporating Regional comments.

Task VII. Conduct the sampling visit according to the site specific sampling plan and Chapters Four through Nine of the RFA Guidance. Coordinate the visit with the project officer and Regional laboratory contact point.

Task VIII. The work plan will address the following information pertaining to sample shipment and the analytical laboratory:

1. The EPA will provide the contractor personnel with a laboratory contact, as well as, provide funding for analyses of the samples.
2. The EPA Regional laboratory will provide ice chests, preservatives, field sheets, sample container and chain-of-custody forms to the contractor for sample collection and shipment.
3. The contractor's personnel will deliver the samples to the laboratory designated by EPA or deliver the samples to the Region VII laboratory as instructed by the Regional laboratory contact.
4. The contractor will ship samples to the designated laboratory in coolers, with samples iced to 4 degrees centigrade.
5. The samples will be delivered by an overnight delivery service.
6. The contractor's personnel will ship the samples under appropriate chain-of-custody procedures. Copies of the chain-of-custody receipts will be included in the deliverables for a QAPP assessment.

Note: Tasks V through VIII are not to be done if a sampling visit is not necessary.

Task IX. Draft the RFA report incorporating the PR, VII and SV. Any other supporting materials including, but not limited to, check lists, field notes, forms, letters, data etc. is to be organized into appendices in the RFA report.

Task X. Finalize the RFA report incorporating the Regional comments and submit the final RFA report.

#### DELIVERABLES

- 1) Draft RFA investigation quality assurance project plan (QAPP)\*
- 2) Final QAPP plan\*
- 3) Draft site specific investigation sampling plan\*
- 4) Final site specific investigation sampling plan\*
- 5) Draft RCRA facility assessment report

6) Final RCRA facility assessment report

\* if a sampling visit is to be conducted at the facility

TRAVEL: A maximum of three trips (two persons each) is allowed to Region VII to collect information to conduct this project, i.e. One trip to the region to review files and conduct the visual site inspection; one trip to conduct the sampling visit; and one other trip to the region if verbally approved by the project officer.

CONFIDENTIAL BUSINESS INFORMATION (CBI): The contractor will set forth in the work plan the status of CBI coverage. Since RCRA regulated facilities can claim information CBI during RFA's, the contractor should achieve CBI coverage prior to initiating field work.

LEVEL OF EFFORT: This project is estimated at 256 hours.

# ESTIMATE OF HOURS

## Preliminary Review -

Travel to Regional Office	4 hours
File review	8 hours
Travel to IDNR Region 6 Office	4 hours
File review	4 hours
Return to contractor's office	4 hours
File review in office	24 hours

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42 hours

## Visual Site Inspection -

Travel to Sheller-Globe	4 hours
Conduct VSI	8 hours
Return to contractor's office	4 hours

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16 hours

## Sampling Visit (if justified) -

Prepare site sampling plan	24 hours
Perform sampling visit	48 hours (3 people, @16 hours)
Prepare Draft RFA Report	80 hours
Prepare Final RFA Report	40 hours

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TOTAL 256 hours



(Shaded areas are for use of procurement only)

US Environmental Protection Agency Washington, DC 20460 <b>EPA</b> <b>Procurement Request/Order</b>		1. Name of Originator David Huyett		2. Date of Requisition 2/1/88			
3. Mail Code RCRA/Iowa		4. Telephone Number FTS 757-2887		5. Date Item Required ASAP			
6. Signature of Originator <i>David Huyett 2/1/88</i>		7. Recommended Procurement Method <input type="checkbox"/> Competitive <input type="checkbox"/> Other than full and open competition <input type="checkbox"/> Sole source small purchase					
8. Deliver To (Project Manager) David Huyett		9. Address 726 Minn. Ave., KC, KS 66101		10. Mail Code RCRA/Iowa			
11. Telephone Number FTS 757-2887		12. Financial Data (a) Appropriation 688/90108					
NOTE: Item 12 (c) Document Type—Contract = "C," Purchase Order = "P," IGA = "A," Other (Misc.) = "X"				2/9/88			
FMO Use (b) (13 digits)		Document Control Number (d) (6 digits) W30082		Account Number (e) (10 digits) 8BGD07W000			
Object Class (f) (4 digits) 25.35		Amount (g) Dollars 14,080		Cents 00			
13. Suggested Source (Name, Address, ZIP Code, Phone/Contact) EPA CONTRACT #68-01-7351 (Jacobs)		14. Amount of money committed is: <input type="checkbox"/> Original <input type="checkbox"/> Increase <input type="checkbox"/> Decrease		15. Servicing Finance Office Number			
16. Approvals							
a. Branch/Office <i>Michael J. Michael</i>		Date 2-4-88		d. Property Management Officer/Designee <i>Shannon Campbell</i>			
b. Division/Office <i>David O. Wapner</i>		Date 2-5-88		e. Other (Specify) <i>M. J. Michael</i>			
c. Funds listed above are available and reserved <i>Beverly J. Michael</i>		Date 2/9/88		f. Other (Specify)			
17. Date of Order		18. Order Number		19. Contract Number (if any)			
20. Discount Terms		21. FOB Point					
22. Delivery to FOB Point by On or before (Date)		23. Person Taking Order/Quote and Phone No.					
24. Contractor (Name, address, ZIP Code)		25. Type of Order <input type="checkbox"/> a. Purchase		Reference your quote (See block 23)			
Please furnish the above on the terms specified on both sides of this order and on the attached sheets, if any, including delivery as indicated.		<input type="checkbox"/> b. Delivery provisions on the reverse are deleted. The delivery order is subject to the terms and conditions of the contract. (See Block 19)					
c. <input type="checkbox"/> Oral <input type="checkbox"/> Written <input type="checkbox"/> Confirming		26. Schedule					
Item Number (a)	Supplies or Services (b)	Quantity Ordered (c)	Unit (d)	Estimated Unit Price (e)	Unit Price (f)	Amount (g)	Quantity Accepted (h)
	RCRA Facility Assessment at Sheller-Globe, Keokuk, IA  Justification: To support permitting and enforcement activities under the Resource Conservation and Recovery Act  NOTE-THESE PROCUREMENT REQUEST IS NOT FOR IOWA RCRA MONEY			14080			
Total \$							
27. United States of America By (Signature)				28. Typed Name and Title of Contracting Officer			